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EPA Comments on Table Titled "*Working Draft Comments Received for Proposed Plan for the Bunker Hill Superfund Site, Bunker Hill Mine Water Management, Kellogg, Idaho*" prepared by CH2M Hill

Steve Hicks and Jim Stefanoff,
CH2M Hill

September 25, 2001

I have reviewed the table of comments and responses on the Bunker Hill Mine Water RI/FS and Proposed Plan. I have also asked Judy Smith, EPA Community Relations, to look at the table. Thanks for your hard work. The table looks great. Judy and I have a few comments as indicated below and in the attached table. Please make the revisions and send out another "working draft." I will forward that draft on to the project team, and then hold a conference call to start discussing who should prepare which responses. Let me know when you can have the table revised.

1. The attached table prepared by Judy Smith includes some additional comments that we would like to have added to the response/comment table. You will note that we have included another "category" of responses called "Public Involvement/Community Acceptance."
2. I'd like to have you reorder the categories in the table and eventually in the responsiveness summary so that technical comments are first, coordination second, and miscellaneous last. I suggest the following: 1) Comments regarding the central treatment plant and treatment of AMD; 2) Comments regarding sludge management; 3) Comments regarding AMD storage; 4) Comments regarding TMDLs; 5) Comments regarding the baseline risk assessment; 6) Comments regarding mine ownership and federal and state involvement with respect to mine ownership; 7) Comments regarding public involvement/community acceptance; 8) Comments regarding coordination efforts for all OU's; and 9) Miscellaneous comments.
3. Regarding the miscellaneous comments: I'd like to limit this category a bit more. Where possible, move comments currently in this section to another part of the table. Here are my suggestions:
 - Comment 2 regarding dissolved metals could go to the CTP and treatment section;
 - Comment 4 - I would separate the part of the comment regarding supplements from the remaining two parts regarding fish/river (i.e., make it two separate comments). If the fish and river comment fits better some where else (e.g., maybe risk assessment section or CTP/treatment section) I would move it.
 - Comment 5 regarding metals standards and average flow and concentration could be moved to the CTP/treatment section;
 - Comment 6 regarding Lucky Friday, Galena and Sunshine mines could be moved to the CTP/treatment of TMDL sections; and

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- Comment 8 - This could be separated into two comments. The first dealing with the other mines could probably be combined with comment 6 above and moved. The second part dealing with catching fish in the river on July 26 could be combined with the second part of comment 4 above and moved.
- 4. In general, where a comment has multiple parts I like it when you identify the parts as a), b), c), and so on as opposed to just listing the parts by bullets. Most of the time you did the a, b, c thing but a few times in the "Comments Regarding Mine Ownership and Federal and State Involvement with Respect to Mine Ownership" section the bullets were used. Please review and correct.
- 5. Comment 5 from (b) (6) in the "Comments Regarding Mine Ownership and Federal and State Involvement with Respect to Mine Ownership." The comment states that (b) (6) provided seven pages of comments. Six of the pages were related to the relationship of EPA, DEQ, and ACOE with the NBHMC and Mr. Hopper." If it is possible to break-out those comments please do so. Judy Smith may have already done so in the attached table of additions to the comments, but I'd appreciate it if you would look back over the original letter and see if there is anything we have missed. Thanks.
- 6. It does not appear that the 9 page comment letter of Mr. Ron Roizen dated September 17, 2001 was included in the table. I'm assuming that you just hadn't gotten to that yet. Please include in the next working draft version.

Thanks,

Mary Kay Voytilla
EPA Project Manager

**Additions to Comments received on the
Proposed Plan Bunker Hill Mine Water Management**

TOPIC KEY =

OWN = Mine Ownership and Federal and State Involvement with respect to mine ownership
 CTP = CTP and Treatment of AMD
 SL = Sludge management
 STOR = AMD Storage
 RISK = Baseline Risk Assessment
 OU = Coordination of efforts for all OU's
 TMDL = TMDL's
 PI = Public Involvement/Community Acceptance
 MISC = Miscellaneous Comments

Topic	Received from	#	Comment	"Response" (by CIC.....)
OWN	Edward Peterson	1	You had the audacity to propose pumping sludge back into the Bunker Hill Mine, regardless of the fact that it is privately owned, and a working business...	In mine storage was designed with input from Mr. Hopper to allow continued private operation of the NBHMC
PI	Edward Peterson	2	You hold these public community meetings because you were forced to do so, not because you wanted my input.	Your continuing input is important and helps shape decisions. PI in the CDA Basin is far more substantial that is required by EPA statute
OWN	(b) [REDACTED] (6) [REDACTED]	1	I am sure fabricated information, erroneous science, and false assumptions are used against Bunker Hill and Mr. Hopper to justify the conception of the management plan.	
PI	(b) [REDACTED] (6) [REDACTED]	2	I have no doubt they intend to implement their management plan no matter what the public says.	
PI	(b) [REDACTED] (6) [REDACTED]	3	"If our opinion mattered, why weren't we asked for comments before you spent 2 million dollars on this arrogant plan to manage something you do not own?"	

PI	(b) (6)	4	...this public comment period and public meeting are mere requirements for you to issue an amendment to the Rod, or is it a new ROD? Or is the new ROD and amendment to the old ROD? Like most things that go on with the EPA/DEQ, the public is left without a clear picture of what you intend to do.	
OWN	(b) (6)	5	When was your master plan for Bunker Hill Mine conceived, and Who were the initial allies?	
OWN	(b) (6)	6	When Mr. Hopper purchased the mineral rights did your plans change? After all they should have. You wanted to CTP and you got it after the bankruptcy from the county, but you did not acquire the Bunker Hill Mine from the bankruptcy of BLP, Mr. Hopper did, so now you should have acknowledged a new ally in the management plan, Mr. Hopper. But of course I know that did not happen - eventually a plan to operate the mine was developed, the plan that surfaced last year during the congressional hearings.	
OWN	(b) (6)	7	Have you offered your assistance to Mr. Hopper, as the owner of the mine, to accomplish the projects within the mine that you are planning to do in spite of him?	
MISC	(b) (6)	8	All the work you have done in Milo Creek has done exactly what Mr. Hopper repeatedly warned you it would - create more infiltration into the Bunker Hill Mine, thus larger volumes of discharge from the KT, resulting in more water to be treated. Why have you progressed to the public hearing stage with a water management plan for the Bunker Hill Mine, which you do not own, and still do not have a management plan for the Milo Creek fiasco, which you have already constructed?	
OWN	(b) (6)	9	What corrupt arrogant bureaucratic official would imagine you could manage any part of the Bunker Hill Mine better than Mr. Hopper.	
OWN	(b) (6)	10	...you have confused two issues, 1. Management and operation of the Central Treatment Plant (CTP), which you own and 2. Management and operation of the Bunker Hill Mine, which you do not own.	
CTP	(b) (6)	11	Could we not look at your record of success at the CTP? I have seen 10 years of your failure to meet the same water quality standards from your treatment plant that you hold other operators of treatment plants in the Valley to. Why do you think we (the public) should let you take on the management of the mine knowing your failure to manage the CTP?	

OWN	(b) [REDACTED] (6) [REDACTED]	12why should the Bunker Hill Mine, a private enterprise, be managed by any of you in any capacity of government?	
OWN	(b) [REDACTED] (6) [REDACTED]	13	...in order to manage the water in the manner you propose, you would need to manage the existence of the mine. You state in your plan many intrusive actions within the mine without assisting Mr. Hopper to do what is best and without considering the impact your inappropriate actions will have on his operation.	
OWN	(b) [REDACTED] (6) [REDACTED]	14	Many people agree with you - all mining in America should be shut down.	
TMDL	(b) [REDACTED] (6) [REDACTED]	15	As I see it, the Bunker Hill Mine...water runs into the mine from various sources (the water is not generated by the mine) and through our ditch system, out the KT (Kellogg Tunnel), and on to the CTP. (The TMDL's the EPA/DEQ reference are not on the water until it is discharged into the river. That means the TMDL responsibility is the treatment plant's not the mine's....so why does EPA/DEQ/ACOE so arrogantly think they should manage the mine water before it reaches their jurisdiction?	
CTP	(b) [REDACTED] (6) [REDACTED]	16	Without improving the [CTP] discharge one iota - they have run the operational costs of the plant from \$40,000 the last year the Bunker Hill Mine was in operation, 1991 - to over a million dollars in 2000.	